

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
 Crawford Former Power Plant - Removal Polrep  
 Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 Region V

**Subject:** POLREP #1  
 Initial  
 Crawford Former Power Plant  
 C5M1  
 Chicago, IL  
 Latitude: 41.8285450 Longitude: -87.7220310

**To:** Richard Karl, SFD  
 Sam Borries, SFD  
 Mike Ribordy, SFD  
 Mark Johnson, ATSDR  
 Chuck Grigalauski, Illinois EPA  
 Tom Baughman, Illinois DPH  
 Bruce Everetts, Illinois EPA  
 Todd Rettig, Illinois DNR  
 Kimberly Worthington, City of Chicago  
 Valencia Darby, Department of Interior

**From:** Paul Ruesch, OSC  
**Date:** 12/10/2012  
**Reporting Period:** 10/3/2012 - 12/7/2012

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5M1	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Assessment
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	12/3/2012	<b>Start Date:</b>	
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Illinois EPA
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Removal Site Assessment

#### 1.1.2 Site Description

The Site occupies approximately 72 acres and is developed with buildings and infrastructure associated with the Midwest Generation, LLC Crawford Generating Station, a coal-fired electric power generation plant. The plant ceased electricity generation operations in August 2012.

### **1.1.2.1 Location**

The Site is located at 3501 South Pulaski Road in Chicago, Illinois. The Site is bordered to the north by West Cougar Street; to the east by South Hamlin Avenue; to the south by the Chicago Sanitary & Ship Canal; and to the west by South Pulaski Road. Residential properties are located approximately 105 feet north and 2,000 feet southeast of the Site.

### **1.1.2.2 Description of Threat**

Though the plant ceased operations in August 2012, local residents and community organizations expressed concerns to EPA over environmental impacts from the Site. In a letter dated September 18, 2012, Chicago Legal Clinic, Inc., legal counsel on behalf of the Pilsen Environmental Rights and Reform Organization (PERRO) and the Little Village Environmental Justice Organization (LVEJO), outlined concerns about environmental impacts from the Site. A copy of this letter can be found in the 'documents' section of the website.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

On September 21, 2012, EPA issued information requests regarding the Site to both Midwest Generation, LLC and ComEd. The document requested reports or documents regarding any investigation and/or sampling of the soil, subsurface soil, groundwater, or air on the Site or off the Site (from potential or actual releases).

In addition, a work plan was developed in coordination with community organizations and local/state/federal health & environmental agencies to conduct perimeter particulate air monitoring and off Site gamma radiation screening to address specific ambient air concerns raised by the community which may be associated with the Site.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

The main activities to be implemented pursuant to the assessment include; 1) review of the documentation submitted by the owner/operator(s) of the Site, and 2) implementation of the work plan developed to address concerns regarding potential dust and gamma radiation impacts to the public from the Site.

#### **2.1.2 Response Actions to Date**

Both Midwest Generation, LLC and ComEd responded to the information requests sent on September 21, 2012 by EPA. Midwest Generation, LLC provided 3 responsive documents on October 3, 2012 and ComEd provided 4 responsive documents on November 2, 2012. The responsive documents include both Phase I and Phase II Environmental Site Assessments conducted for the Site. These documents were reviewed by EPA for information relevant to the concerns raised by the community organization(s).

As discussed in Section 1.1.3, a work plan was developed in coordination with community organizations and local/state/federal health & environmental agencies to conduct perimeter particulate air monitoring and off Site gamma radiation screening to address specific ambient air concerns raised by the community which may be associated with the Site.

The perimeter air monitoring component of the work plan was conducted on December 3 and 5 at the Site. EPA crews completed two 8-hour days of perimeter air monitoring for particulates in both calm and windy conditions. Four stationary monitors (see photograph) were placed at the north, south, east and west edges of the Site and a fifth monitor was mounted in a stroller (see photograph) and pushed around the Site boundary repeatedly throughout each day. A weather station was also placed at the Site to collect information on wind speed/direction, humidity, barometric pressure and temperature over the course of the monitoring.

Additionally, radiation screening was conducted in targeted areas surrounding the Site on December 7. This work consisted of EPA staff walking up and down streets with a backpack (see photograph) containing a gamma radiation detector equipped with GPS tracking and a laptop with software capable of both storing and plotting data points.

#### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

The owner of the Site is Midwest Generation, LLC. Midwest Generation, LLC responded to an information request issued by EPA by providing responsive documents on October 3, 2012. In addition,

Midwest Generation, LLC signed a Consent For Access to Property on November 30, 2012 allowing EPA to access the Site perimeter to conduct the particulate air monitoring.

## 2.1.4 Progress Metrics

N/A

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

EPA staff is currently evaluating the data from the perimeter air monitors, radiation instrumentation, and weather station. EPA plans to report the data at a monthly meeting with community group representatives in January. A follow-up Fact Sheet with results will be developed and distributed to the community in both English and Spanish. Next steps will be determined in coordination with community group representatives.

#### 2.2.1.1 Planned Response Activities

See Section 2.2.1.

#### 2.2.1.2 Next Steps

EPA will provide community group representatives with an overview of field monitoring activities at a scheduled meeting on December 13, 2012. EPA will summarize and prepare data from air monitoring and radiation screening for discussion with community group representatives in January 2013. At that time, EPA will discuss strategies for dissemination of monitoring results to residents in the community.

#### 2.2.2 Issues

None

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

### 2.4.1 Narrative

See Table.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
TAT/START	\$25,000.00	\$10,000.00	\$15,000.00	60.00%
<b>Intramural Costs</b>				
USEPA - Direct	\$0.00	\$5,000.00	(\$5,000.00)	0.00%
<b>Total Site Costs</b>	\$25,000.00	\$15,000.00	\$10,000.00	40.00%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

OSC Paul Ruesch serves as safety officer for all field activities. 'Tailgate' safety briefings are held and a field safety roster is signed by all field personnel each day prior to initiating any work activities. In addition, a supplemental safety briefing is provided by a representative from Midwest Generation, LLC at the Site each day prior to commencement of field work.

#### **2.5.2 Liaison Officer**

OSC Paul Ruesch serves as liaison officer with Midwest Generation, LLC, participating local/state/federal agencies, and any interested citizens which visit the Site during work activities.

#### **2.5.3 Information Officer**

Heriberto Leon serves as the Community Involvement Coordinator for this project. A Fact Sheet in both English and Spanish was developed and distributed prior to field activities in coordination with community group representatives. The Fact Sheets, photographs, maps, diagrams and project updates can be found at the following website: <http://www.epa.gov/Region5/cleanup/crawfordfisk/index.html>.

### **3. Participating Entities**

#### **3.1 Unified Command**

N/A

#### **3.2 Cooperating Agencies**

Illinois Environmental Protection Agency

Illinois Department of Public Health

Chicago Department of Public Health

Chicago Department of Fleet & Facility Management - Bureau of Environmental, Health and Safety Management

Agency for Toxic Substances and Disease Registry

### **4. Personnel On Site**

U.S. EPA - 4

START - 2

### **5. Definition of Terms**

No information available at this time.

### **6. Additional sources of information**

#### **6.1 Internet location of additional information/report**

<http://www.epaosc.org/fiskpowerplant>

<http://www.epa.gov/Region5/cleanup/crawfordfisk/index.html>

<http://epa.gov/region5/littlevillagepilsen/>

#### **6.2 Reporting Schedule**

The next POLREP is anticipated to be issued at the end of January 2013.

### **7. Situational Reference Materials**

No information available at this time.